



ADM Capital Europe LLP ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

1. Purpose of this policy

- 1.1. Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the “Act”). Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain. This document sets out the policy of ADM Capital Europe LLP (the “ADMCEU”) with the aim of the prevention of opportunities for modern slavery to occur within its or its funds’ (which it advises) businesses or supply chain. This policy’s use of the term “modern slavery” has the meaning given in the Act.
- 1.2. ADMCEU has a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own businesses or those of the portfolio companies owned by funds which we advise (the “Portfolio Companies”).

2. Steps for the Prevention of Modern Slavery

- 2.1 We are committed to ensuring there is transparency in our own business as well as those of the Portfolio Companies and in our approach to tackling modern slavery, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our Portfolio Companies as well as our and their suppliers and other business partners. We are evolving and updating our contracting processes to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children.
- 2.2 To underpin our compliance with practical steps, we intend to implement the following measures:
 - a) conduct risk assessments to determine which parts of our and our Portfolio Companies’ business and which of their suppliers are most at risk of modern slavery so that efforts can be focused on those areas;
 - b) engage with our and our Portfolio Companies’ and their suppliers both to convey to them our Anti-Slavery and Human Trafficking Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses and their supply chain; and



- c) introduce supplier pre-screening (for example as part of our due diligence process) on safeguarding controls.

3. Responsibility for the Policy

- 3.1 Ultimate responsibility for the prevention of modern slavery rests with ADMCEU's leadership. The management board of ADMCEU has overall responsibility for ensuring this policy and its implementation comply with our legal and ethical obligations.

4. Actions to report modern slavery or human trafficking

4.1 Internal

Officers and employees are encouraged to raise any concerns about suspected modern slavery associated with the ADMCEU, its Portfolio Companies or our or their suppliers.

4.2 External

Members of the public or people not employed by ADMCEU should write, in confidence, to the ADM Capital's COO, Jeremy Alun-Jones (either via e-mail: jeremy.alunjones@admcap.com or to the registered office) to raise any concern, issue or suspicion of modern slavery in any part of our or our Portfolio Companies' business.

- 4.3 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

- 4.4 ADMCEU will accept and take seriously concerns communicated anonymously. However, retention of anonymity does render investigations and validation more difficult and can make the process less effective.

Individuals are therefore encouraged to put their names to allegations.

5. Breaches of this policy

- 5.1 If an issue is identified, we will work with the relevant supplier or Portfolio Company



to prepare a corrective action plan and resolve all violations within an agreed upon time period.

5.2 We reserve the right terminate our relationship with individuals and organisations in our supply chain if they breach this policy.

6. **Communication and awareness of this policy**

6.1 Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

7. **Review**

7.1 Following its initial adoption, this Anti-Slavery and Human Trafficking Policy will be reviewed by ADM Capital's COO on a regular basis (at least annually) and may be amended from time to time.